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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ALEXANDRA ALLEN, as
Administrator of the Estate of William Allen,

Plaintiff,

-against-

KENNEDY INFORMATION, INC. and
THE BUREAU OF NATIONAL AFFAIRS, INC.

Defendants.

Electronically Filed

Docket No. 07 CIV 8431
(HB)(DFE)

**DECLARATION OF
DEANNA R. WALDRON
IN OPPOSITION TO
PLAINTIFF'S MOTION
TO DISMISS THE FIRST
AND SECOND
COUNTERCLAIMS OF
DEFENDANT KENNEDY**

-----X

Deanna R. Waldron, an attorney duly admitted to practice law in the Courts of the State of New York and the United States District Court of the Southern District of New York, declares the following to be true under the penalties of perjury pursuant to 28 U.S.C. §1746:

1. I am a member of the law firm McLaughlin & Stern, LLP, attorneys for defendant Kennedy Information, Inc. ("Kennedy") in the above-captioned action. I submit this declaration in opposition to Plaintiff's motion to dismiss the First and Second Counterclaims of defendant Kennedy.

2. A true and correct copy of the Answer, Defenses and Amended Counterclaims, dated January 18, 2008, in the above-captioned action ("Counterclaims") is annexed hereto as Exhibit "1".

3. Based on the allegations contained in the Counterclaims, it is sufficient to state a claim for which relief can be granted for Kennedy, and as such, should not be dismissed.

WHEREFORE, Kennedy respectfully requests that this Court deny Plaintiff's motion to dismiss Counts One and Two of the Counterclaim.

Dated: New York, New York
January 18, 2008

/s/ _____
Deanna R. Waldron (DW 2611)